

# Exhibit 1

ADRMOP, E-Filing, RELATE

**U.S. District Court  
California Northern District (Oakland)  
CIVIL DOCKET FOR CASE #: 4:07-cv-00716-SBA**

Hile v. Ritz Camera Centers, Inc.  
Assigned to: Hon. Saundra Brown Armstrong  
Lead case: 4:07-cv-06342-SBA  
Member case: (View Member Case)  
Cause: 15:1681 Fair Credit Reporting Act

Date Filed: 02/02/2007  
Jury Demand: Plaintiff  
Nature of Suit: 890 Other Statutory Actions  
Jurisdiction: Federal Question

**Plaintiff**

**Zachary Hile**  
*on behalf of herself and all others  
similarly situated*

represented by **Eric A. Grover**  
Keller Grover LLP  
425 Second Street, Suite 500  
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V.

**Defendant**

**Ritz Camera Centers, Inc.**

represented by **Richard Thomas Williams**  
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21st Floor  
Los Angeles, CA 90071  
213-896-2410  
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*ATTORNEY TO BE NOTICED*

Date Filed	#	Docket Text
02/02/2007	<u>1</u>	COMPLAINT With Jury Demand against Ritz Camera Centers, Inc. ( Filing fee \$ 350, receipt number 34611002525.). Filed by Zachary Hile. (jlm, COURT STAFF) (Filed on 2/2/2007) Additional attachment(s) added on 2/12/2007 (jlm, COURT STAFF). (Entered: 02/06/2007)
02/02/2007		CASE DESIGNATED for Electronic Filing. (jlm, COURT STAFF) (Filed on 2/2/2007) (Entered: 02/06/2007)
02/02/2007		Summons Issued as to Ritz Camera Centers, Inc.. (jlm, COURT STAFF) (Filed on 2/2/2007) (Entered: 02/06/2007)
02/02/2007	<u>2</u>	ADR SCHEDULING ORDER: Case Management Statement due by 5/2/2007. Case Management Conference set for 5/9/2007 03:00 PM. (Attachments: # <u>1</u> Standing Order - SBA)(jlm, COURT STAFF) (Filed on 2/2/2007) (Entered: 02/06/2007)
02/02/2007	<u>3</u>	Certificate of Interested Entities, filed by Zachary Hile (jlm, COURT STAFF) (Filed on 2/2/2007) Additional attachment(s) added on 2/12/2007 (jlm, COURT STAFF). (Entered: 02/06/2007)
02/20/2007	<u>4</u>	CLERK'S NOTICE Case Management Conference set for 5/9/2007 03:30 PM. VIA TELEPHONE. (lrc, COURT STAFF) (Filed on 2/20/2007) (Entered: 02/20/2007)
04/23/2007	<u>5</u>	SUMMONS Returned Executed by Zachary Hile. Ritz Camera Centers, Inc. served on 4/18/2007, answer due 5/8/2007. (Butman, Jade) (Filed on 4/23/2007) (Entered: 04/23/2007)
05/01/2007	<u>6</u>	MOTION to Continue filed by Zachary Hile. (Butman, Jade) (Filed on 5/1/2007) (Entered: 05/01/2007)
05/03/2007	<u>7</u>	ORDER: That the Case Management Conference is RESET for 6/28/2007 at 03:15 PM. VIA TELEPHONE. Signed by Judge ARMSTRONG on 5/2/07. (lrc, COURT STAFF) (Filed on 5/3/2007) Modified on 5/4/2007 (jlm,

		COURT STAFF). (Entered: 05/03/2007)
05/08/2007	<u>8</u>	MOTION to Dismiss <i>and in the Alternative, Motion for More Definite Statement</i> filed by Ritz Camera Centers, Inc.. Motion Hearing set for 7/3/2007 01:00 PM in Courtroom 3, 3rd Floor, Oakland. (Williams, Richard) (Filed on 5/8/2007) (Entered: 05/08/2007)
05/08/2007	<u>9</u>	MEMORANDUM in Support of <i>Ritz Camera Centers's Motion to Dismiss; and, in the Alternative, Motion for More Definite Statement</i> filed by Ritz Camera Centers, Inc.. (Attachments: # <u>1</u> Exhibit Exhibit A to Memorandum In Support of Motion to Dismiss# <u>2</u> Exhibit Exhibit B to Memorandum in Support of Motion to Dismiss)(Williams, Richard) (Filed on 5/8/2007) (Entered: 05/08/2007)
05/08/2007	<u>10</u>	Certificate of Interested Entities <i>or Persons</i> by Ritz Camera Centers, Inc. (Williams, Richard) (Filed on 5/8/2007) Modified on 5/9/2007 (jlm, COURT STAFF). (Entered: 05/08/2007)
05/08/2007	<u>11</u>	Proposed Order <i>Granting Ritz Camera Centers's Motion to Dismiss and Motion for More Definite Statement</i> by Ritz Camera Centers, Inc.. (Williams, Richard) (Filed on 5/8/2007) (Entered: 05/08/2007)
06/08/2007	<u>12</u>	AMENDED CERTIFICATE OF SERVICE by Zachary Hile re <u>1</u> Complaint (Butman, Jade) (Filed on 6/8/2007) Modified on 6/11/2007 (jlm, COURT STAFF). (Entered: 06/08/2007)
06/12/2007	<u>13</u>	Memorandum in Opposition re <u>8</u> MOTION to Dismiss <i>and in the Alternative, Motion for More Definite Statement</i> filed by Zachary Hile. (Acevedo, Elizabeth) (Filed on 6/12/2007) (Entered: 06/12/2007)
06/12/2007	<u>14</u>	Declaration of Eric A. Grover in Support of <u>13</u> Memorandum in Opposition to <i>Defendant's Motion to Dismiss Complaint Pursuant to FRCP 12(b)(6)</i> filed by Zachary Hile. (Related document(s) <u>13</u> ) (Acevedo, Elizabeth) (Filed on 6/12/2007) (Entered: 06/12/2007)
06/12/2007	<u>15</u>	Proposed Order re <u>8</u> MOTION to Dismiss <i>and in the Alternative, Motion for More Definite Statement</i> by Zachary Hile. (Acevedo, Elizabeth) (Filed on 6/12/2007) (Entered: 06/12/2007)
06/14/2007	<u>16</u>	STIPULATION AND [PROPOSED] ORDER STAYING PROCEEDINGS FOR 60 DAYS PENDING MEDIATION by Ritz Camera Centers, Inc.. (Gonden, David) (Filed on 6/14/2007) (Entered: 06/14/2007)
06/15/2007	<u>17</u>	ORDER by Judge ARMSTRONG denying as moot <u>8</u> Motion to Dismiss (lrc, COURT STAFF) (Filed on 6/15/2007) (Entered: 06/15/2007)
06/18/2007	<u>18</u>	ADR Certification (ADR L.R. 3-5b) of discussion of ADR options (Acevedo, Elizabeth) (Filed on 6/18/2007) (Entered: 06/18/2007)
08/27/2007	<u>19</u>	JOINT CASE MANAGEMENT STATEMENT AND RULE 26(f) DISCOVERY PLAN filed by Zachary Hile. (Butman, Jade) (Filed on 8/27/2007) (Entered: 08/27/2007)

08/30/2007	<u>20</u>	STIPULATION and text of proposed order staying proceedings by Ritz Camera Centers, Inc.. (Cooper, Tara) (Filed on 8/30/2007) (Entered: 08/30/2007)
09/06/2007	<u>21</u>	Minute Entry: Initial Case Management Conference held on 9/6/2007 before JUDGE ARMSTRONG (Date Filed: 9/6/2007). Further Case Management Conference set for 10/10/2007 02:45 PM. VIA TELEPHONE.() (lrc, COURT STAFF) (Date Filed: 9/6/2007) (Entered: 09/07/2007)
09/27/2007	<u>22</u>	NOTICE of Conditional Settlement by Ritz Camera Centers, Inc. (Gonden, David) (Filed on 9/27/2007) Modified on 9/28/2007 (jlm, COURT STAFF). (Entered: 09/27/2007)
09/28/2007	<u>23</u>	JOINT CASE MANAGEMENT STATEMENT filed by Zachary Hile. (Butman, Jade) (Filed on 9/28/2007) (Entered: 09/28/2007)
10/11/2007	<u>24</u>	CLERK'S NOTICE Case Management Conference set for 11/14/2007 03:30 PM. via telephone. (lrc, COURT STAFF) (Filed on 10/11/2007) (Entered: 10/11/2007)
11/05/2007	<u>25</u>	JOINT CASE MANAGEMENT STATEMENT filed by Zachary Hile. (Butman, Jade) (Filed on 11/5/2007) (Entered: 11/05/2007)
11/13/2007	<u>26</u>	CLERK'S NOTICE Case Management Conference set for 1/23/2008 03:00 PM. via telephone. (lrc, COURT STAFF) (Filed on 11/13/2007) (Entered: 11/13/2007)
01/11/2008	<u>27</u>	ORDER RELATING CASE.. Signed by Judge ARMSTRONG on 1/10/08. (lrc, COURT STAFF) (Filed on 1/11/2008) (Entered: 01/11/2008)
01/11/2008		Cases associated: Create association to 4:07-cv-06342-SBA. (jlm, COURT STAFF) (Filed on 1/11/2008) (Entered: 01/11/2008)
01/11/2008	<u>28</u>	JOINT CASE MANAGEMENT STATEMENT filed by Zachary Hile, Ritz Camera Centers, Inc. (Butman, Jade) (Filed on 1/11/2008) Modified on 1/14/2008 (jlm, COURT STAFF). (Entered: 01/11/2008)
01/14/2008	<u>29</u>	CLERK'S NOTICE Case Management Conference set for 5/7/2008 02:30 PM. via telephone. (lrc, COURT STAFF) (Filed on 1/14/2008) (Entered: 01/14/2008)

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Description:	Docket Report	Search Criteria:	4:07-cv-00716-SBA

<b>Billable Pages:</b>	3	<b>Cost:</b>	0.24
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ADRMOP, E-Filing, RELATE

**U.S. District Court  
California Northern District (Oakland)  
CIVIL DOCKET FOR CASE #: 4:07-cv-06342-SBA**

Andonian v. Ritz Camera Centers, Inc.  
Assigned to: Hon. Saundra Brown Armstrong  
Demand: \$5,000,000  
Member case: [\(View Member Case\)](#)  
Case in other court: U.S.D.C., Central District of CA,  
Western Division, 2:07-cv-02349-GAF  
Cause: 15:1681 Fair Credit Reporting Act

Date Filed: 12/14/2007  
Jury Demand: Both  
Nature of Suit: 480 Consumer Credit  
Jurisdiction: Federal Question

**Plaintiff**

**Shogher Andonian**  
*individually and on behalf of all others  
similarly situated*

represented by **Launa Nicole Everman**  
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*ATTORNEY TO BE NOTICED*

V.

**Defendant**

**Ritz Camera Centers, Inc.**  
*a Delaware corporation*

represented by **David M. Gonden**  
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**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

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**ATTORNEY TO BE NOTICED**

**Tara Lynn Cooper**  
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Fax: 213-896-2450  
Email: tara.cooper@hklaw.com  
**ATTORNEY TO BE NOTICED**

Date Filed	#	Docket Text
12/14/2007	<u>1</u>	Case transferred in from District of CA, Central, Western Division; Case Number 2:07-cv-02349-GAF-FMO. Original file with documents numbered 1-13, certified copy of transfer order and docket sheet received.. Filed by Shogher Andonian. (Attachments: # <u>1</u> Case Transfer In, # <u>2</u> Acknmt. of Receipt of Case, # <u>3</u> USDC CD #1, # <u>4</u> USDC CD #2, # <u>5</u> USDC CD Summons, # <u>6</u> USDC CD #3, # <u>7</u> USDC CD #4, # <u>8</u> USDC CD #5, # <u>9</u> USDC CD #6, # <u>10</u> USDC CD #7, # <u>11</u> USDC CD #8, # <u>12</u> USDC CD #9, # <u>13</u> USDC CD #10, # <u>14</u> USDC CD #11, # <u>15</u> USDC CD #12, # <u>16</u> USDC CD #13, # <u>17</u> USDC CD Dkt Report)(jlm, COURT STAFF) (Filed on 12/14/2007) (Entered: 12/18/2007)
12/14/2007	<u>2</u>	ADR SCHEDULING ORDER: Case Management Conference set for 3/20/2008 03:00 PM. Case Management Statement due by 3/13/2008. (Attachments: # <u>1</u> Standing Order - SBA)(jlm, COURT STAFF) (Filed on 12/14/2007) (Entered: 12/18/2007)
12/14/2007		CASE DESIGNATED for Electronic Filing. (jlm, COURT STAFF) (Filed on 12/14/2007) (Entered: 12/18/2007)
01/11/2008	<u>3</u>	ORDER RELATING CASE.. Signed by Judge ARMSTRONG on 1/10/08. (lrc, COURT STAFF) (Filed on 1/11/2008) (Entered: 01/11/2008)

01/14/2008	4	CLERK'S NOTICE Case Management Conference set for 5/7/2008 02:30 PM. via telephone. (lrc, COURT STAFF) (Filed on 1/14/2008) (Entered: 01/14/2008)
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PACER Service Center			
Transaction Receipt			
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Billable Pages:	2	Cost:	0.16

# Exhibit 2



Start **Oakland, CA**  
End **Beltsville, MD**  
Travel **2,808 mi – about 1 day 17 hours**

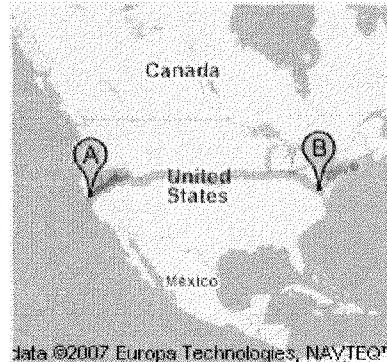
Get Google Maps on your phone  
Text the word "GMAPS" to 466453

### Oakland, CA

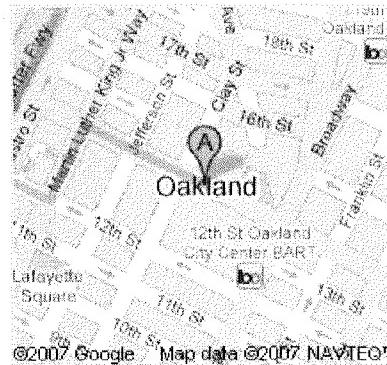
Drive: 2,808 mi – about 1 day 17 hours

- |   |                              |
|---|------------------------------|
| 1. Head <b>northwest</b> on <b>14th St/Int'l Dr</b> toward <b>Clay St</b>   | 0.2 mi                       |
| ← 2. Turn <b>left</b> at <b>Martin Luther King Jr Way</b>   | 0.1 mi<br>1 min              |
| → 3. Turn <b>right</b> at <b>12th St</b>  | 374 ft                       |
| → 4. Turn <b>right</b> to merge onto <b>I-980 E</b> toward <b>Walnut Creek/CA-24 E</b>  | 1.0 mi<br>2 mins             |
| 5. Take the exit onto <b>I-580 W</b> toward <b>San Francisco</b>  | 5.8 mi<br>6 mins             |
| ← 6. Slight <b>left</b> at <b>I-80 E</b> (signs for <b>I-80/ Vallejo/Sacramento</b> )<br>Partial toll road                        | 69.3 mi<br>1 hour 6 mins     |
| 7. Take the exit onto <b>I-80 E</b> toward <b>Reno</b><br>Passing through Nevada<br>Entering Utah                                 | 651 mi<br>9 hours 4 mins     |
| 8. Take the exit toward <b>I-15 S/I-80 E</b>  | 0.3 mi                       |
| ← 9. Keep <b>left</b> at the fork, follow signs for <b>I-80 E/ I-15 S/Cheyenne/Las Vegas</b> and merge onto <b>I-15 S/I-80 E</b>  | 2.5 mi<br>3 mins             |
| 10. Take exit <b>304</b> to merge onto <b>I-80 E</b> toward <b>Cheyenne</b><br>Passing through Wyoming, Nebraska<br>Entering Iowa | 1,053 mi<br>14 hours 24 mins |
| 11. Take exit <b>123B</b> to merge onto <b>I-35 N/I-80 E</b> toward <b>Minneapolis/Chicago</b>                                    | 15.0 mi<br>14 mins           |
| 12. Continue on <b>I-80 E</b>   | 151 mi<br>2 hours 14 mins    |
| 13. Take exit <b>290</b> for <b>US-6 E/I-280 E</b> toward <b>Moline/Rock Island</b>   | 0.7 mi                       |
| 14. Merge onto <b>I-280 E</b><br>Entering Illinois  | 26.7 mi<br>26 mins           |

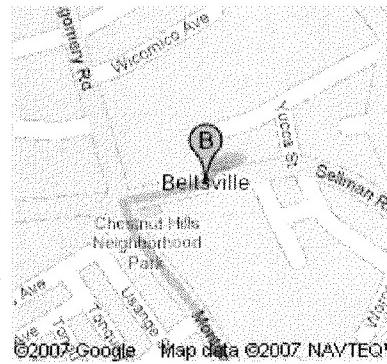
### Overview



### Start



### End



Map data ©2008 NAVTEQ™,  
Sanborn





Start 219 S Dearborn St  
Chicago, IL 60603  
End Beltsville, MD

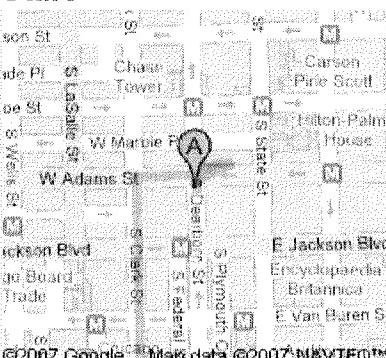
Travel 698 mi – about 11 hours 16  
mins

Get Google Maps on your phone  
Text the word "GMAPS" to 466453

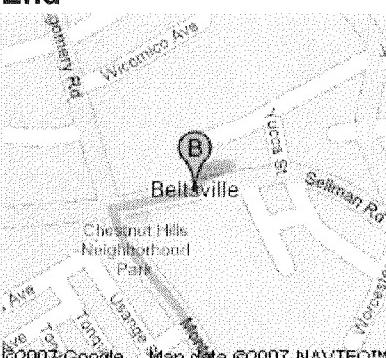
## Overview



## Start



## End



Map data ©2008 NAVTEQ™,  
Sanborn

219 S Dearborn St  
Chicago, IL 60603

Drive: 698 mi – about 11 hours 16 mins

1. Head north on **S Dearborn St** toward **W Adams St** 89 ft
2. Turn left at **W Adams St** 394 ft 1 min
3. Turn left at **S Clark St** 0.3 mi 2 mins
4. Turn right at **W Congress Pkwy** 0.3 mi 2 mins
5. Continue on **Eisenhower Expy W/I-290 W** 0.2 mi
6. Take the **I-94 E/I-90 E/Ryan Expy** exit toward **Indiana** 0.7 mi 1 min
7. Merge onto **Dan Ryan Expy E/I-90 E/ I-94 E** 313 mi 4 hours 52 mins  
Continue to follow I-90 E  
Partial toll road  
Passing through Indiana  
Entering Ohio
8. Continue on **I-80 E/Ohio Turnpike** 76.2 mi 1 hour 12 mins  
Toll road
9. Continue on **I-76 E** (signs for **I-76 E**) 184 mi 2 hours 54 mins  
Toll road  
Entering Pennsylvania
10. Take exit **161** to merge onto **I-70 E** toward **Washington D C/Breezewood/Baltimore** 2.2 mi 3 mins  
Partial toll road
11. Take the **US-30 W** exit 0.1 mi
12. Merge onto **I-70/US-30** 76.2 mi 1 hour 16 mins  
Continue to follow I-70  
Entering Maryland
13. Take exit **53** to merge onto **I-270 S** toward **Washington** 32.7 mi 34 mins
14. Merge onto **Capital Beltway/I-495 E** 9.2 mi 10 mins

- |   |                  |
|---|------------------|
| 15. Take exit 25B-A for US-1/Baltimore Ave toward Laurel/College Park | 0.8 mi<br>2 mins |
| ← 16. Keep left at the fork to continue toward Baltimore Ave/US-1     | 0.2 mi           |
| 17. Take exit 25A for Baltimore Blvd/US-1 N toward Laurel             | 0.2 mi<br>2 mins |
| 18. Merge onto Baltimore Ave/US-1                                     | 1.0 mi<br>2 mins |
| ← 19. Turn left at Montgomery Rd                                      | 0.5 mi<br>1 min  |
| → 20. Turn right at Sellman Rd  | 0.1 mi           |



These directions are for planning purposes only. You may find that construction projects, traffic, or other events may cause road conditions to differ from the map results.

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# Exhibit 3



The Difference

Our Services

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## Our History

### Global Reach

#### Embracing Diversity

#### Community Commitment

#### Pro Bono

#### Innovative Approach

#### Case Studies

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## Global Reach

### USA

Atlanta  
Bethesda  
Boston  
Chicago  
Fort Lauderdale  
Jacksonville  
Lakeland  
Los Angeles  
Miami  
New York  
Northern Virginia  
Orlando  
Portland  
San Francisco  
Tallahassee  
Tampa  
Washington, D.C.  
West Palm Beach

### CHINA

Beijing

### ISRAEL

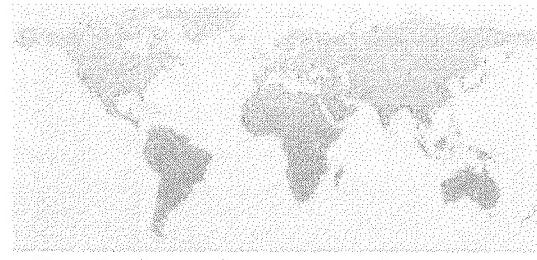
Tel Aviv\*  
*Haim Samet, Steinmetz,  
Haring & Co.*

### MEXICO

Mexico City  
*Holland & Knight -  
Gallástegui y Lozano, S.C.*

### VENEZUELA

Caracas\*  
*Tinoco, Travieso, Planchart &  
Núñez*



No matter how we have grown, we have never forgotten the importance of providing personalized, local attention. Today, we offer the very same client-focused service in more areas of the world, giving you access to an impressive global network.

At Holland & Knight, we are able to tap the intellectual resources of more than 1,100 attorneys in the US and abroad to address client interests spread across the scope of the United States and international marketplace. In addition, we have over 600 alums of our foreign training program practicing in 40 countries around the world.

Within this global network, we are able to manage and direct multi-jurisdictional transactions and address your business interests - anywhere in the world - with complete confidence.

\* Representative Offices

# Exhibit 4

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MARK THOMAS, individually and on ) No. 08 CV 453  
behalf of all others similarly situated, )  
Plaintiff, ) Judge Guzman  
v. ) Magistrate Judge Cole  
RITZ CAMERA CENTERS, INC., ) JURY DEMANDED  
Defendant. )  
)

**DEFENDANT'S RESPONSE TO PLAINTIFF'S  
FIRST DISCOVERY REQUESTS**

**REQUESTS FOR ADMISSION**

**REQUEST FOR ADMISSION NO. 1:**

Defendant became aware of FACTA on or before December 4, 2006.

**OBJECTION TO REQUEST FOR ADMISSION NO. 1:**

Request No. 1 is ambiguous as to the meaning of "became aware of" and as what aspects or elements of FACTA the Request is directed to.

**RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

Defendant admits that, prior to December 4, 2006, it understood that a federal law dealing with credit card numbers had been enacted, but

settlement services providers), VeriSign, Inc. (Defendant's PCI consultant/auditor), Datavantage Corporation (Defendant's POS software system upgrade contractor) and Matthew Edmonds (Consultant to Defendant with respect to liaison with Chase Merchant Services LLC/First Data, American Express and credit card companies).

**INTERROGATORY NO. 5:**

Identify and provide the number for all persons to whom defendant provided an electronically printed receipt at the point of sale or transaction, in a transaction occurring after December 4, 2006, which receipt displays either (a) more than the last five digits of the person credit card or debit card number, and/or (b) the expiration date of the person's credit or debit card.

**OBJECTION TO INTERROGATORY NO. 5:**

This Interrogatory is ambiguous as to "identify"; further, it seeks information private to individual customers of Defendant, which Defendant cannot produce without an appropriate Protective Order in place herein; finally, it is oppressive and burdensome in that the information it seeks is contained in documents whose production may be sought, rather than requiring a separate listing in response to this interrogatory..

**RESPONSE TO INTERROGATORY NO. 5:**

Subject to and without waiving the foregoing objection to this Interrogatory, Defendant responds that between December 4, 2006 and April 9, 2007, at Ritz Camera Centers Inc. retail locations in Cook County, Illinois, in credit card and debit card transactions, Ritz Camera Centers Inc. printed 75,000 receipts which displayed the expiration dates of a person's credit card or debit card and printed no receipts which displayed more than five digits of a person's credit card or debit card.

**INTERROGATORY NO. 6:**

State how and when you first learned of FACTA's expiration date and credit card number truncation requirements, and identify what steps and/or procedures you took in order to prevent credit card expiration dates or more than five digits of the card number from being printed on receipts. Include the date the step was taken, the person(s) who decided to take the step, the person(s) who performed the step and how the step altered defendant's practices.

**RESPONSE TO INTERROGATORY NO. 6:**

In April 2005 Defendant commenced implementing coding changes for its Point of Sale ("POS") software in order to comply with VISA CISP

# Exhibit 5

**Public Act 095-0437**

SB1398 Enrolled

LRB095 08474 RAS 28653 b

AN ACT concerning regulation.

**Be it enacted by the People of the State of Illinois,  
represented in the General Assembly:**

Section 5. The Collection Agency Act is amended by changing Sections 2, 2.03, and 3 and by adding Sections 9.1, 9.2, 9.3, 9.4, and 9.7 as follows:

(225 ILCS 425/2) (from Ch. 111, par. 2002)

(Section scheduled to be repealed on January 1, 2016)

Sec. 2. Definitions. In this Act:

"Consumer credit transaction" means a transaction between a natural person and another person in which property, service, or money is acquired on credit by that natural person from such other person primarily for personal, family, or household purposes.

"Consumer debt" or "consumer credit" means money, property, or their equivalent, due or owing or alleged to be due or owing from a natural person by reason of a consumer credit transaction.

"Creditor" means a person who extends consumer credit to a debtor.

"Debt" means money, property, or their equivalent which is due or owing or alleged to be due or owing from a natural person to another person.

"Debt collection" means any act or practice in connection with the collection of consumer debts.

"Debt collector", "collection agency", or "agency" means any person who, in the ordinary course of business, regularly, on behalf of himself or herself or others, engages in debt collection.

"Debtor" means a natural person from whom a debt collector seeks to collect a consumer debt that is due and owing or alleged to be due and owing from such person.

"Department" means Division of Professional Regulation within the Department of Financial and Professional Regulation.

"Director" means the Director of the Division of Professional Regulation within the Department of Financial and Professional Regulation.

"Person" means a natural person, partnership, corporation, limited liability company, trust, estate, cooperative, association, or other similar entity. Unless the context clearly requires otherwise, the following terms have the meanings ascribed to them in Sections 2.01 through 2.02.  
(Source: P.A. 78-1248.)

(225 ILCS 425/2.03) (from Ch. 111, par. 2005)

(Section scheduled to be repealed on January 1, 2016)

Sec. 2.03. This Act does not apply to persons whose collection activities are confined to and are directly related to the operation of a business other than that of a collection

agency, and specifically does not include the following:

1. Banks, including trust departments, affiliates, and subsidiaries thereof, fiduciaries, and financing and lending institutions (except those who own or operate collection agencies);
2. Abstract companies doing an escrow business;
3. Real estate brokers when acting in the pursuit of their profession;
4. Public officers and judicial officers acting under order of a court;
5. Licensed attorneys at law;
6. Insurance companies;
7. Credit unions, including affiliates and subsidiaries thereof;
8. Loan and finance companies;
9. Retail stores collecting their own accounts;
10. Unit Owner's Associations established under the Condominium Property Act, and their duly authorized agents, when collecting assessments from unit owners; and
11. Any person or business under contract with a creditor to notify the creditor's debtors of a debt using only the creditor's name.

(Source: P.A. 89-387, eff. 1-1-96.)

(225 ILCS 425/3) (from Ch. 111, par. 2006)

(Section scheduled to be repealed on January 1, 2016)

Sec. 3. A person, association, partnership, corporation, or other legal entity acts as a collection agency when he or it:

- (a) Engages in the business of collection for others of any account, bill or other indebtedness;
- (b) Receives, by assignment or otherwise, accounts, bills, or other indebtedness from any person owning or controlling 20% or more of the business receiving the assignment, with the purpose of collecting monies due on such account, bill or other indebtedness;
- (c) Sells or attempts to sell, or gives away or attempts to give away to any other person, other than one registered under this Act, any system of collection, letters, demand forms, or other printed matter where the name of any person, other than that of the creditor, appears in such a manner as to indicate, directly or indirectly, that a request or demand is being made by any person other than the creditor for the payment of the sum or sums due or asserted to be due;
- (d) Buys accounts, bills or other indebtedness with ~~recourse~~ and engages in collecting the same; or
- (e) Uses a fictitious name in collecting its own accounts, bills, or debts with the intention of conveying to the debtor that a third party has been employed to make such collection.

(Source: P.A. 94-414, eff. 12-31-05.)

(225 ILCS 425/9.1 new)

(Section scheduled to be repealed on January 1, 2016)

Sec. 9.1. Communication with persons other than debtor.

- (a) Any debt collector or collection agency communicating with any person other than the debtor for the purpose of acquiring location information about the debtor shall:
  - (1) identify himself or herself, state that he or she is confirming or correcting location information

concerning the consumer, and, only if expressly requested, identify his or her employer;

(2) not state that the consumer owes any debt;

(3) not communicate with any person more than once

unless requested to do so by the person or unless the debt collector or collection agency reasonably believes that the earlier response of the person is erroneous or incomplete and that the person now has correct or complete location information;

(4) not communicate by postcard;

(5) not use any language or symbol on any envelope or in the contents of any communication effected by mail or telegram that indicates that the debt collector or collection agency is in the debt collection business or that the communication relates to the collection of a debt; and

(6) after the debt collector or collection agency knows the debtor is represented by an attorney with regard to the subject debt and has knowledge of or can readily ascertain the attorney's name and address, not communicate with any person other than the attorney, unless the attorney fails to respond within a reasonable period of time, not less than 30 days, to communication from the debt collector or collection agency.

(225 ILCS 425/9.2 new)

(Section scheduled to be repealed on January 1, 2016)

Sec. 9.2. Communication in connection with debt collection.

(a) Without the prior consent of the debtor given directly to the debt collector or collection agency or the express permission of a court of competent jurisdiction, a debt collector or collection agency may not communicate with a debtor in connection with the collection of any debt in any of the following circumstances:

(1) At any unusual time, place, or manner that is known or should be known to be inconvenient to the debtor. In the absence of knowledge of circumstances to the contrary, a debt collector or collection agency shall assume that the convenient time for communicating with a debtor is after 8 o'clock a.m. and before 9 o'clock p.m. local time at the debtor's location.

(2) If the debt collector or collection agency knows the debtor is represented by an attorney with respect to such debt and has knowledge of or can readily ascertain, the attorney's name and address, unless the attorney fails to respond within a reasonable period of time to a communication from the debt collector or collection agency or unless the attorney consents to direct communication with the debtor.

(3) At the debtor's place of employment, if the debt collector or collection agency knows or has reason to know that the debtor's employer prohibits the debtor from receiving such communication.

(b) Except as provided in Section 9.1 of this Act, without the prior consent of the debtor given directly to the debt collector or collection agency or the express permission of a court of competent jurisdiction or as reasonably necessary to effectuate a post judgment judicial remedy, a debt collector or collection agency may not communicate, in connection with the collection of any debt, with any person other than the debtor,

the debtor's attorney, a consumer reporting agency if otherwise permitted by law, the creditor, the attorney of the creditor, or the attorney of the collection agency.

(c) If a debtor notifies a debt collector or collection agency in writing that the debtor refuses to pay a debt or that the debtor wishes the debt collector or collection agency to cease further communication with the debtor, the debt collector or collection agency may not communicate further with the debtor with respect to such debt, except to perform any of the following tasks:

(1) Advise the debtor that the debt collector's or collection agency's further efforts are being terminated.

(2) Notify the debtor that the collection agency or creditor may invoke specified remedies that are ordinarily invoked by such collection agency or creditor.

(3) Notify the debtor that the collection agency or creditor intends to invoke a specified remedy.

If such notice from the debtor is made by mail, notification shall be complete upon receipt. (d) For the purposes of this Section, "debtor" includes the debtor's spouse, parent (if the debtor is a minor), guardian, executor, or administrator.

(225 ILCS 425/9.3 new)

(Section scheduled to be repealed on January 1, 2016)

Sec. 9.3. Validation of debts.

(a) Within 5 days after the initial communication with a debtor in connection with the collection of any debt, a debt collector or collection agency shall, unless the following information is contained in the initial communication or the debtor has paid the debt, send the debtor a written notice with each of the following disclosures:

(1) The amount of the debt.

(2) The name of the creditor to whom the debt is owed.

(3) That, unless the debtor, within 30 days after receipt of the notice, disputes the validity of the debt, or any portion thereof, the debt will be assumed to be valid by the debt collector or collection agency.

(4) That, if the debtor notifies the debt collector or collection agency in writing within the 30-day period that the debt, or any portion thereof, is disputed, the debt collector or collection agency will obtain verification of the debt or a copy of a judgment against the debtor and a copy of the verification or judgment will be mailed to the debtor by the debt collector or collection agency.

(5) That upon the debtor's written request within the 30-day period, the debt collector or collection agency will provide the debtor with the name and address of the original creditor, if different from the current creditor. If the disclosures required under this subsection (a) are placed on the back of the notice, the front of the notice shall contain a statement notifying debtors of that fact.

(b) If the debtor notifies the debt collector or collection agency in writing within the 30-day period set forth in paragraph (3) of subsection (a) of this Section that the debt, or any portion thereof, is disputed or that the debtor requests the name and address of the original creditor, the debt collector or collection agency shall cease collection of the debt, or any disputed portion thereof, until the debt collector or collection agency obtains verification of the debt or a copy of a judgment or the name and address of the original creditor.

and mails a copy of the verification or judgment or name and address of the original creditor to the debtor.

(c) The failure of a debtor to dispute the validity of a debt under this Section shall not be construed by any court as an admission of liability by the debtor.

(225 ILCS 425/9.4 new)

(Section scheduled to be repealed on January 1, 2016)

Sec. 9.4. Debt collection as a result of identity theft.

(a) Upon receipt from a debtor of all of the following information, a debt collector or collection agency must cease collection activities until completion of the review provided in subsection (d) of this Section:

(1) A copy of a police report filed by the debtor alleging that the debtor is the victim of an identity theft crime for the specific debt being collected by the debt collector.

(2) The debtor's written statement that the debtor claims to be the victim of identity theft with respect to the specific debt being collected by the debt collector, including (i) a Federal Trade Commission's Affidavit of Identity Theft, (ii) an Illinois Attorney General ID Theft Affidavit, or (iii) a written statement that certifies that the representations are true, correct, and contain no material omissions of fact to the best knowledge and belief of the person submitting the certification. This written statement must contain or be accompanied by, each of the following, to the extent that an item listed below is relevant to the debtor's allegation of identity theft with respect to the debt in question:

(A) A statement that the debtor is a victim of identity theft.

(B) A copy of the debtor's driver's license or identification card, as issued by this State.

(C) Any other identification document that supports the statement of identity theft.

(D) Specific facts supporting the claim of identity theft, if available.

(E) Any explanation showing that the debtor did not incur the debt.

(F) Any available correspondence disputing the debt after transaction information has been provided to the debtor.

(G) Documentation of the residence of the debtor at the time of the alleged debt, which may include copies of bills and statements, such as utility bills, tax statements, or other statements from businesses sent to the debtor and showing that the debtor lived at another residence at the time the debt was incurred.

(H) A telephone number for contacting the debtor concerning any additional information or questions or direction that further communications to the debtor be in writing only, with the mailing address specified in the statement.

(I) To the extent the debtor has information concerning who may have incurred the debt, the identification of any person whom the debtor believes is responsible.

(J) An express statement that the debtor did not authorize the use of the debtor's name or personal information for incurring the debt.

(b) A written certification submitted pursuant to item (iii) of paragraph (2) of subsection (a) of this Section shall be sufficient if it is in substantially the following form:  
"I certify that the representations made are true, correct, and contain no material omissions of fact known to me."

(Signature)

(Date)"

(c) If a debtor notifies a debt collector or collection agency orally that he or she is a victim of identity theft, the debt collector or collection agency shall notify the debtor orally or in writing, that the debtor's claim must be in writing. If a debtor notifies a debt collector or collection agency in writing that he or she is a victim of identity theft, but omits information required pursuant to this Section, if the debt collector or collection agency does not cease collection activities, the debt collector or collection agency must provide written notice to the debtor of the additional information that is required or send the debtor a copy of the Federal Trade Commission's Affidavit of Identity Theft form.

(d) Upon receipt of the complete statement and information described in subsection (a) of this Section, the debt collector shall review and consider all of the information provided by the debtor and other information available to the debt collector or collection agency in its file or from the creditor. The debt collector or collection agency may recommence debt collection activities only upon making a good faith determination that the information does not establish that the debtor is not responsible for the specific debt in question. The debt collector or collection agency must notify the consumer in writing of that determination and the basis for that determination before proceeding with any further collection activities. The debt collector's or collection agency's determination shall be based on all of the information provided by the debtor and other information available to the debt collector or collection agency in its file or from the creditor.

(e) No inference or presumption that the debt is valid or invalid or that the debtor is liable or not liable for the debt may arise if the debt collector or collection agency decides after the review described in subsection (d) to cease or recommence the debt collection activities. The exercise or non-exercise of rights under this Section is not a waiver of any other right or defense of the debtor or debt collector.

(f) A debt collector or collection agency that (i) ceases collection activities under this Section, (ii) does not recommence those collection activities, and (iii) furnishes adverse information to a consumer credit reporting agency, must notify the consumer credit reporting agency to delete that adverse information.

(225 ILCS 425/9.7 new)

Sec. 9.7. Enforcement under the Consumer Fraud and Deceptive Business Practices Act. The Attorney General may enforce the knowing violation of Section 9 (except for items (1) through (9) and (19) of subsection (a)), 9.1, 9.2, 9.3, or 9.4 of this Act as an unlawful practice under the Consumer Fraud and Deceptive Business Practices Act.

(225 ILCS 425/2.01 rep.)

(225 ILCS 425/2.02 rep.)

Section 10. The Collection Agency Act is amended by repealing Sections 2.01 and 2.02.

Section 99. Effective date. This Act takes effect January 1, 2008.

**Effective Date:** 1/1/2008

# Exhibit 6

ILLINOIS ATTORNEY GENERAL LISA MADIGAN

PRESS RELEASE

[www.IllinoisAttorneyGeneral.gov](http://www.IllinoisAttorneyGeneral.gov)

For Immediate Release

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January 29, 2007

**MADIGAN ANNOUNCES TOP 10 CONSUMER COMPLAINTS FOR  
2006; ID THEFT COMPLAINTS TOP LIST**

Chicago—Attorney General Lisa Madigan today announced that for the first time in the history of the Illinois Attorney General's Top 10 Consumer Complaint List, identity theft complaints topped the list, exceeding the other categories by far. Madigan attributes the dramatic increase in consumer complaints concerning ID theft to her office's new Identity Theft Hotline, announced in February 2006.

Madigan also announced that her office's Consumer Protection Division received a record number of consumer complaints in the last year. In 2006, the Consumer Protection Division received 32,724 consumer complaints, a more than 18 percent increase over the 26,652 consumer complaints received in 2005. This increase follows a nearly 11 percent increase in consumer complaints in 2005.

In 2006, Madigan's Consumer Protection Division fielded 188,292 calls for assistance and recovered through mediation more than \$7.7 million with litigation savings of more than \$18 million for a total of more than \$26 million in savings to Illinois consumers.

Of the complaints received in 2006, 5,237, or 16 percent, concerned identity theft. Just as in 2005, credit-related complaints ranked second on the Top 10 list, with 3,444 consumer complaints. Coming in third on the list are the 3,204 construction and home improvement complaints that Madigan's office received in 2006.

Along with the striking jump in the number of identity theft complaints, Madigan noted that the 2006 statistics reveal another significant new trend in consumer complaints. For the first time, her office received more than 700 complaints from homeowners with mortgage-related problems. Although this number falls just shy of the top ten, it marks a greater than 100 percent increase in mortgage-related complaints since 2005.

In a large number of these complaints, consumers contacted the Attorney General's office seeking help in problems with so-called "mortgage rescuers." In a typical case, the mortgage rescuer promised to help homeowners on the brink of foreclosure to save their home, but, instead, the rescuer purchased the property for a fraction of its value and stripped the equity from the home, leaving the homeowners with nothing.

In response to this disturbing trend, Madigan drafted and worked to pass the Mortgage Rescue Fraud Act in the last legislative session. This Act, which went into effect on January 1, 2007, requires that mortgage rescuers either save the home as promised, or pay the homeowners 82 percent of the home's fair market value. Madigan also filed three law suits in 2006 against mortgage rescuers for allegedly engaging in illegal practices to deprive several Illinois homeowners of their homes.

"The 2006 Top Ten list provides an overview of the problems that consumers faced in the marketplace over the past year and our consumer protection priorities. It clearly shows that identity theft continues to be one of the fastest growing frauds in Illinois and across the country," Madigan said. "The sharp increase in ID theft complaints reflects both this disturbing trend and our increasing efforts to provide needed help to consumers who are struggling to restore their good name and those who are looking to protect themselves from this fraud."

"This snapshot of our consumer protection work also shows a troubling increase in the number of homeowners who are victimized by unscrupulous scam artists," Madigan noted. "We are continuing to devote greater resources to protecting homeowners from these devastating frauds. All of the information that we receive from consumers who file complaints with our Consumer Protection Division is vital to our ongoing consumer protection work."

#### ***No. 1: Identity Theft Complaints***

Consumer complaints regarding identity theft raise a range of issues confronting victims of this rapidly-growing fraud. Specifically, the ID theft consumer complaints involved:

1. **Credit cards (1,428 complaints)**, including reports of the takeover of an existing credit card account by a thief and also instances of a thief opening a new credit card account in the name of an ID theft victim;
2. **Phone, internet, and utility company complaints (736)**, concerning fraudulent wireless or landline phone, Internet, gas, electric, and water accounts opened in the ID theft victim's name;
3. **Bank fraud complaints (439)**, including complaints regarding stolen checks, new bank accounts opened in an ID theft victim's name, and fraudulent withdrawals of money from victims' bank accounts;

4. **Collection agency complaints (202)**, involving attempts by collection agencies to collect debts from ID theft victims that actually were incurred by ID thieves.

Consumers brought most of these complaints to Madigan's office by contacting her new Identity Theft Hotline (1-866-999-5630). Through this help line, trained advocates and attorneys have worked with consumers to help them restore their credit.

#### *No. 2: Credit-Related Complaints*

Complaints regarding credit came in second place in 2006, including **2,210** complaints about **collection agencies**, reflecting consumers' ongoing and significant problems with collection agencies. While complaints regarding credit also came in second place on the 2005 Top 10 List, the 2,210 complaints involving collection agencies in 2006 represents a significant increase from 1,451 collection agency complaints received in 2005.

Consumer complaints about collection agencies include allegations that an agency has violated the Illinois Consumer Fraud Act by refusing to substantiate a debt that the agency is trying to collect even after the consumer requests substantiation, making collection calls to a consumer's work place and to family members, placing collection calls at inappropriate times, and using inappropriate and threatening language when contacting consumers. Other collection agency complaints include failing to properly trace the consumer, resulting in attempts to collect a debt from the wrong consumer, attempting to collect on time-barred debts, and sending misleading collection letters which resemble court documents.

In addition to collection agency complaints, other credit-related complaints involved:

1. **Credit cards (907)**, including complaints about unauthorized membership club charges appearing on credit card accounts, balance transfer and introductory rate problems, higher interest rates than expected, and unexpected fees; and
2. Erroneous entries on **credit reports (178)**.

#### *No. 3: Construction and Home Improvement Fraud Complaints*

Construction and home improvement fraud came in third on the 2006 list and consistently has ranked as one of the top three consumer complaints since 1984. Complaints regarding construction and home improvement in 2006 include those related to **remodeling (1,101 complaints)**; **roofs and gutters (391)**; **siding, windows, and doors (350)**; **new construction (263)**; and **plumbing and sewers (175)**. This category also includes 924 complaints about other construction-related issues.

Most of the consumers who contacted Madigan's office to file complaints

involving construction and home improvement alleged that the companies either failed to begin or complete the construction work or, in other cases, provided poor quality work. Throughout 2006, Madigan's office filed numerous lawsuits against contractors alleging construction and home improvement fraud.

#### *No. 4: Telecommunications Complaints*

Telecommunications complaints ranked fourth in 2006 and included claims regarding **wireless service and cellular phones (749 complaints)**, such as complaints about wireless phone bills reflecting higher rates than consumers expected as a result of confusion over rate plans, complaints about the assessment of early termination fees when the consumer canceled after unknowingly having extended the contract term when upgrading the phone or changed rate plans, unauthorized charges for ring tones or games, and unsolicited text messages.

Consumer complaints about telecommunications problems also included:

1. **Long distance service (394 complaints)**, such as bills for long distance charges for dial up internet service when consumers accidentally chose local toll numbers instead of local access phone numbers and general billing issues and errors;
2. **Cable and satellite service (376)** such as unwanted telemarketing calls to consumers on the do not call list, and reports of misrepresentation of charges and available channels;
3. **Do not call (372)**, concerning telemarketing calls placed to consumers who are on the do not call list or calls placed after consumers specifically have requested not to receive further telemarketing calls;
4. **Internet service providers and DSL (295)**, including complaints of continuing to bill consumers after they attempt to cancel their monthly internet service;
5. **Local phone service and repairs (277)** such as general billing issues; and
6. **Other telecommunications-related complaints (319)**, such as pay-per-view website charges and phone bill cramming.

The Top 10 consumer complaints for 2006 are as follows (the figures listed below do not reflect all of the complaints):

CATEGORY	# OF COMPLAINTS
1. Identity Theft	5,237

<b>2. Credit</b>	<b>3,444</b>
<b>3. Construction/Home Improvement</b>	<b>3,204</b>
<b>4. Telecommunications</b>	<b>2,782</b>
<b>5. Promotions and Schemes</b>	<b>2,261</b>
<b>6. Financial Services</b>	<b>1,695</b>
<b>7. Motor Vehicles/Used Auto Sales</b>	<b>1,486</b>
<b>8. Mail Order</b>	<b>1,475</b>
<b>9. Business to Business Fraud</b>	<b>815</b>
<b>10. Motor Vehicle/Non-Warranty Repair</b>	<b>790</b>

For all consumer fraud issues, consumers can visit Madigan's website at [www.illinoisattorneygeneral.gov](http://www.illinoisattorneygeneral.gov) or call one of the Consumer Fraud Hotlines or the Identity Theft Hotline at the numbers listed below.

**Chicago Consumer Fraud Hotline:** 1-800-386-5438 and  
1-800-964-3013 (TTY)

**Springfield Consumer Fraud Hotline:** 1-800-243-0618 and  
1-877-844-5461 (TTY)

**Carbondale Consumer Fraud Hotline:** 1-800-243-0607 and  
1-877-675-9339 (TTY)

**Spanish Language Hotline:** 1-866-310-8398

**Identity Theft Hotline:** 1-866-999-5630 and 1-877-844-5461  
(TTY)

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